

**From:** ["Wilder, Scott" <Wilder.Scott@epa.gov>](mailto:Wilder.Scott@epa.gov)  
**To:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov)  
**CC:** [rocrecordsR10 <rocrecordsR10@epa.gov>](mailto:rocrecordsR10@epa.gov)  
**Date:** 8/14/2019 9:03:28 AM  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

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Thanks Natalie,

We have had other facilities with pending enforcement related to financial assurance and determined that they were still acceptable to receive CERCLA waste. I think we'll follow the same pattern here unless you object.

Thanks,

Scott Wilder  
Enforcement & Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 155, M/S: 20-CO4  
Seattle, WA  
206-553-6693

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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) <[Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov)>  
**Sent:** Tuesday, August 13, 2019 9:38 AM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Scott,

USEI continues to recover from the 11/17/18 explosion incident. They have resumed treatment operations. A copy of their latest monthly recovery progress report is attached.

They have completed their own internal investigation into the incident. A copy of the executive summary of their investigation report is attached, as well as their news release regarding their internal investigation. DEQ is still reviewing the investigation report; any potential DEQ enforcement is still pending.

DEQ has prepared a draft RCRA Notice of Violation for violations of financial assurance requirements, referred to DEQ by EPA Region 10 in 2018. The draft NOV is with the Idaho Attorney General's Office for legal review. The NOV cites eight violations. The violations pertain to wording of the assignment clause in their closure/post-closure insurance; the lack of an automatic renewal provision in their closure/post-closure insurance; the aggregate coverage level for liability insurance coverage; and the cancellation language in their liability insurance policy.

I am not in a position to determine if the violations in the draft financial assurance NOV would impact USEI's ability to receive CERCLA waste. I would be happy to discuss further if you like. When we do issue the NOV (expected sometime in the next couple of weeks), USEI will be afforded the opportunity for a compliance conference with DEQ, during which they can explain the violations, and/or explain why they feel we are in error, and/or demonstrate how they may have already corrected them.

Feel free to let me know if you have any questions.

Natalie

**Natalie Creed | Hazardous Waste Bureau Chief**  
Idaho Department of Environmental Quality  
1410 N. Hilton St., Boise, Idaho 83705  
Office: (208) 373-0506  
<http://www.deq.idaho.gov/>

*Our mission is to protect human health and the quality of Idaho's air, land, and water.*

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Thursday, August 08, 2019 9:50 AM  
**To:** Natalie K. Creed  
**Cc:** rocrecordsR10  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

It's been a few months since I last checked with IDEQ about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Enforcement & Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 155, M/S: 20-CO4  
Seattle, WA  
206-553-6693

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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) <[Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov)>  
**Sent:** Friday, April 19, 2019 1:31 PM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

They are still recovering from the 11/17/18 incident, and are restarting operations in a limited fashion. We recently authorized USEI to begin using their existing outdoor stabilization facility again, for non-hazardous waste treatment only. They are still not allowed to treat hazardous waste, though it is expected they will be sometime in the next couple of months. On May 14, USEI and their contractor, Baker Risk, will be giving us a formal presentation on their internal investigation findings.

Feel free to let me know if you have any questions.

Natalie

**Natalie Creed | Hazardous Waste Bureau Chief**  
Idaho Department of Environmental Quality  
1410 N. Hilton St., Boise, Idaho 83705  
Office: (208) 373-0506  
<http://www.deq.idaho.gov/>

*Our mission is to protect human health and the quality of Idaho's air, land, and water.*

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Friday, April 19, 2019 2:15 PM

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**To:** Natalie K. Creed  
**Cc:** rocrecordsR10  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

Are there any new developments since your last email that might impact this facility's ability to accept waste under the CERCLA offsite rule?

Thanks,

Scott Wilder  
Enforcement & Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 155, M/S: 20-CO4  
Seattle, WA  
206-553-6693

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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) <[Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov)>  
**Sent:** Friday, February 22, 2019 2:06 PM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Scott,

On November 17, 2018, an explosion occurred at the US Ecology Idaho facility during treatment of magnesium fines that resulted in one fatality, eight injured, and significant damage to a portion of the facility.

The recovery from the incident is occurring in a phased approach. On February 8, 2019, DEQ granted US Ecology approval to restart limited operations. USEI is currently allowed to accept certain bulk wastes that meet disposal criteria. USEI is not allowed to conduct treatment operations during this initial phase. Here is a link to the DEQ news release regarding the Temporary Authorization they are currently operating under:

<http://www.deq.idaho.gov/news-archives/waste-us-ecology-limited-operations-approval-021119/>

DEQ is still investigating the incident, as is EPA-CID and OSHA, and US Ecology's contractor. Any enforcement is still pending and under review. The financial assurance NOV is still pending as well.

Let me know if you have any questions or would like to discuss.

Natalie

Natalie Creed  
Hazardous Waste Unit Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Friday, February 22, 2019 10:03 AM  
**To:** Natalie K. Creed

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**Cc:** rocrecordsR10

**Subject:** FW: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

I know you were out of the office until earlier this week, but wanted to check in on this request. Please respond when you can.

Thanks,

Scott Wilder  
Office of Compliance & Enforcement  
U.S. Environmental Protection Agency, Region 10  
Seattle, WA  
206-553-6693

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**From:** [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov) <[Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov)>

**Sent:** Thursday, February 14, 2019 8:53 AM

**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>

**Cc:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov); rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hello Scott,

I'll have to let Natalie answer your question as I am no longer in the Compliance Manager position. I've moved on.

Thanks,  
Curt

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]

**Sent:** Thursday, February 14, 2019 9:38 AM

**To:** Curt Ohlsen

**Cc:** Natalie K. Creed; rocrecordsR10

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Curt,

It's been a few months since I last checked with IDEQ about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
206-553-6693

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**From:** [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov) <[Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov)>

**Sent:** Tuesday, October 09, 2018 7:59 AM

**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>

**Cc:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov); rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>; [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov)

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654) - ENFORCEMENT

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ENFORCEMENT CONFIDENTIAL

Hello Scott,

US Ecology was included in the EPA financial review initiative kicked off earlier this year. As such, their record review uncovered potential violations that we are looking to address in an NOV which was also EPA's recommendation/preference. The NOV is in draft so its classified as "enforcement confidential" at this time.

In answer to your question, after reviewing EPA's record review report and our own which is currently underway, we do not feel that these potential financial assurance violations would in any way impact US Ecology's ability to accept CERCLA waste. Please contact me if you have any questions.

Thanks,  
Curt Ohlsen  
Hazardous Waste Compliance Manager  
Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706  
Office (208) 373-0278  
Fax (208) 373-0154

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Friday, October 05, 2018 9:48 AM  
**To:** Curt Ohlsen  
**Cc:** Natalie K. Creed; rocrecordsR10  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Curt,

It's been a few months since I last checked with IDEQ about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

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**From:** [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov) [<mailto:Curt.Ohlsen@deq.idaho.gov>]  
**Sent:** Wednesday, June 20, 2018 10:12 AM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Cc:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov); rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>; [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov)  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

No, we have not identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

Thanks,  
Curt Ohlsen  
Hazardous Waste Compliance Manager

Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706  
Office (208) 373-0278  
Fax (208) 373-0154

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Wednesday, June 20, 2018 11:08 AM  
**To:** Curt Ohlsen  
**Cc:** Natalie K. Creed; rocrecordsR10  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Curt,

I made a note to myself to check back in with you regarding this facility after the date you expected the latest inspection report to be finalized. Anything new to report that might affect the facility's ability to accept CERCLA waste?

Thanks,

Scott Wilder  
Office of Compliance & Enforcement  
U.S. Environmental Protection Agency, Region 10  
Seattle, WA  
206-553-6693

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**From:** [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov) [<mailto:Curt.Ohlsen@deq.idaho.gov>]  
**Sent:** Thursday, May 10, 2018 11:10 AM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Cc:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov); [Curt.Ohlsen@deq.idaho.gov](mailto:Curt.Ohlsen@deq.idaho.gov)  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

No, we have not identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

We did conduct the annual RCRA CEI inspection on April 24 – 26, 2018, with EPA oversight. The inspection report is pending but expected to be finalized by June 8, 2018. I realize that these are the exact same dates as last year's inspection but I guess that's either a striking coincidence or it shows how extremely prompt we are. ☐

Please contact me for any further questions.

Thanks,  
Curt Ohlsen  
Hazardous Waste Compliance Manager  
Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706  
Office (208) 373-0278  
Fax (208) 373-0154

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Thursday, May 10, 2018 9:21 AM  
**To:** Curt Ohlsen

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**Cc:** rocrecordsR10

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Curt,

It's been a few months since I last checked with IDEQ about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

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**From:** [Curtis.Ohlsen@deq.idaho.gov](mailto:Curtis.Ohlsen@deq.idaho.gov) [<mailto:Curtis.Ohlsen@deq.idaho.gov>]

**Sent:** Monday, March 19, 2018 9:18 AM

**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>

**Cc:** [Curtis.Ohlsen@deq.idaho.gov](mailto:Curtis.Ohlsen@deq.idaho.gov)

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Scott,

No, we have not currently identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

Thanks,  
Curt Ohlsen  
Hazardous Waste Compliance Manager  
Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706  
Office (208) 373-0278  
Fax (208) 373-0154

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]

**Sent:** Monday, March 19, 2018 9:57 AM

**To:** Curt Ohlsen

**Cc:** rocrecordsR10

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Curt,

It's been a few months since I last checked with IDEQ about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693



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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) [<mailto:Natalie.Creed@deq.idaho.gov>]

**Sent:** Monday, January 22, 2018 8:37 AM

**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>

**Cc:** rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>; [Curtis.Ohlsen@deq.idaho.gov](mailto:Curtis.Ohlsen@deq.idaho.gov); [dennis.meier@deq.idaho.gov](mailto:dennis.meier@deq.idaho.gov)

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

No change since the last update. We do not currently have any open hazardous waste violations or enforcement actions with US Ecology and I don't know of any reason they shouldn't be allowed to accept CERCLA waste.

In November, we filled the vacancy we had in our Hazardous Waste Compliance Manager position. In the future, please feel free to contact Curt Ohlsen with questions regarding US Ecology's RCRA compliance status. Here is his contact info, and I have cc'd him on this email:

Curt Ohlsen  
Hazardous Waste Compliance Manager  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0278  
[Curtis.Ohlsen@deq.idaho.gov](mailto:Curtis.Ohlsen@deq.idaho.gov)

Sincerely,

Natalie Creed  
Hazardous Waste Unit Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

---

**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]

**Sent:** Friday, January 19, 2018 10:20 AM

**To:** Natalie K. Creed

**Cc:** rocrecordsR10

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

It's been a few months since I last checked with you about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) [<mailto:Natalie.Creed@deq.idaho.gov>]



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**Sent:** Wednesday, September 27, 2017 3:00 PM

**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

No, we have not currently identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

The inspection report was finalized on June 8, 2017 for the annual RCRA Compliance Evaluation Inspection (CEI) inspection conducted on April 24 – 26, 2017. A Warning Letter was issued to USEI-B on August 22, 2017 for three violations as a result of the April 24 – 26, 2017 inspection. Our Warning Letters are informal enforcement actions used to address violations that are relatively minor in nature. All three violations are considered resolved, and I do not know of any reason USEI-B shouldn't be allowed to accept CERCLA waste.

A copy of the Warning Letter is attached. Feel free to let me know if you have any questions.

*Natalie Creed*

Hazardous Waste Program Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

---

**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]

**Sent:** Wednesday, September 27, 2017 3:18 PM

**To:** Natalie K. Creed

**Cc:** rocrecordsR10

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

It's been a few months since I last checked with you about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

---

**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) [<mailto:Natalie.Creed@deq.idaho.gov>]

**Sent:** Tuesday, June 06, 2017 9:29 AM

**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>

**Cc:** rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>

**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

The inspection report has been drafted but is not yet finalized. Based on review of the draft, I'm not aware of any issues that would impact USEI-B's ability to receive and properly manage CERCLA waste.

*Natalie Creed*

Hazardous Waste Compliance Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

---

**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Tuesday, June 06, 2017 10:09 AM  
**To:** Natalie K. Creed  
**Cc:** rocrecordsR10  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

Just following up from your last message. Has the most recent inspection report been finalized? Did the inspection find anything that would impact the facilities ability to receive CERCLA waste?

Thanks for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) [<mailto:Natalie.Creed@deq.idaho.gov>]  
**Sent:** Wednesday, May 03, 2017 12:35 PM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Cc:** rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

No, we have not currently identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

We did conduct the annual RCRA CEI inspection last week, April 24 – 26, 2017. The inspection report and any potential outcome are pending. The inspection report is expected to be finalized by June 8, 2017.

As always, feel free to let me know if you have any questions.

*Natalie Creed*

Hazardous Waste Compliance Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Wednesday, May 03, 2017 11:20 AM  
**To:** Natalie K. Creed  
**Cc:** rocrecordsR10  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

It's been a few months so it's time for me to check in with you about this facility. Has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

---

**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) [<mailto:Natalie.Creed@deq.idaho.gov>]  
**Sent:** Thursday, February 09, 2017 8:41 AM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

No, we have not identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

Feel free to let me know if you have any other questions,

Natalie Creed  
Hazardous Waste Compliance Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Wednesday, February 08, 2017 3:23 PM  
**To:** Natalie K. Creed  
**Cc:** rocrecordsR10  
**Subject:** FW: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

It's been a few months since I last checked with you about the US Ecology facility. Since I last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

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**From:** Wilder, Scott  
**Sent:** Tuesday, October 18, 2016 10:09 AM  
**To:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov)  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Thanks Natalie.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 101  
Seattle, WA 98101  
206-553-6693

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**From:** [Natalie.Creed@deq.idaho.gov](mailto:Natalie.Creed@deq.idaho.gov) [<mailto:Natalie.Creed@deq.idaho.gov>]  
**Sent:** Tuesday, October 18, 2016 10:07 AM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Cc:** Parker, Jennifer <[Parker.Jennifer@epa.gov](mailto:Parker.Jennifer@epa.gov)>; rocrecordsR10 <[rocrecordsR10@epa.gov](mailto:rocrecordsR10@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Scott,

We have not identified any new violations, releases, or any other issues that would impact USEI-B's ability to receive CERCLA waste.

Feel free to let me know if you have any questions,

*Natalie Creed*

Hazardous Waste Compliance Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.creed@deq.idaho.gov](mailto:natalie.creed@deq.idaho.gov)

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**From:** Wilder, Scott [<mailto:Wilder.Scott@epa.gov>]  
**Sent:** Monday, October 17, 2016 1:06 PM  
**To:** Natalie K. Creed  
**Cc:** Parker, Jennifer; rocrecordsR10  
**Subject:** FW: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

I'm taking over CERCLA Off-Site requests from Jennifer Parker and my first request is for U.S. Ecology – Site B.

Since Jennifer last checked with you, has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you for your help.

Scott Wilder  
Office of Compliance and Enforcement  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS OCE 127  
Seattle, WA 98101  
206-553-6693

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**From:** Parker, Jennifer  
**Sent:** Monday, October 17, 2016 10:55 AM  
**To:** Wilder, Scott <[Wilder.Scott@epa.gov](mailto:Wilder.Scott@epa.gov)>  
**Subject:** FW: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

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**From:** [Natalie.Clough@deq.idaho.gov](mailto:Natalie.Clough@deq.idaho.gov) [<mailto:Natalie.Clough@deq.idaho.gov>]  
**Sent:** Wednesday, August 03, 2016 12:19 PM  
**To:** Parker, Jennifer <[Parker.Jennifer@epa.gov](mailto:Parker.Jennifer@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Jennifer,

The inspection report has been finalized for the June 22 – 23, 2016 RCRA compliance evaluation inspection at U.S. Ecology Idaho – Site B, EPA ID number IDD073114654. No enforcement action will be issued as a result of the inspection. There were no violations or issues that should prevent USEI-B from receiving CERCLA waste.

Feel free to let me know if you have any questions,

Sincerely,

*Natalie Clough*  
Hazardous Waste Compliance Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.clough@deq.idaho.gov](mailto:natalie.clough@deq.idaho.gov)

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**From:** Parker, Jennifer [<mailto:Parker.Jennifer@epa.gov>]  
**Sent:** Tuesday, June 28, 2016 6:12 PM  
**To:** Natalie Clough  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Thank you. And yes, it will be helpful if you are able to provide the information about the compliance status when the inspection report is finalized.

Jennifer Parker  
U.S. Environmental Protection Agency, Region 10  
Multimedia Inspection and RCRA Enforcement Unit  
1200 Sixth Ave, Suite 900, OCE-101  
Seattle, Washington 98101  
(206) 553-1900  
1-800-424-4EPA

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**From:** [Natalie.Clough@deq.idaho.gov](mailto:Natalie.Clough@deq.idaho.gov) [<mailto:Natalie.Clough@deq.idaho.gov>]  
**Sent:** Tuesday, June 28, 2016 2:26 PM  
**To:** Parker, Jennifer <[Parker.Jennifer@epa.gov](mailto:Parker.Jennifer@epa.gov)>  
**Subject:** RE: CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Jennifer,

We just conducted the annual RCRA Compliance Evaluation Inspection (CEI) at USEI-B (EPA ID # IDD073114654) on June 22 – 23, 2016. The inspection report is pending, and it is expected to be finalized by 8/8/16. We are still completing our reviews related to the inspection, however based on our preliminary findings there were only a few minor issues, mostly relating to inspection records. I participated in this year's inspection, and I did not observe any violations, uncontrolled releases, or other issues that should prevent the facility from being able to receive CERLA waste.

I will be happy to provide an update on USEI-B's compliance status when the inspection report is finalized.

Feel free to let me know if you have any questions,

Sincerely,

*Natalie Clough*

Hazardous Waste Compliance Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0506  
[natalie.clough@deq.idaho.gov](mailto:natalie.clough@deq.idaho.gov)

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**From:** Parker, Jennifer [<mailto:Parker.Jennifer@epa.gov>]  
**Sent:** Monday, June 27, 2016 1:20 PM  
**To:** Natalie Clough  
**Subject:** CERCLA Off-Site Acceptability – US Ecology Idaho (RCRA ID # IDD073114654)

Hi Natalie,

As we've previously discussed, the Off-Site Rule, 40 C.F.R. § 300.440, requires that CERCLA waste (hazardous substances, pollutants, or contaminants as defined under CERCLA sections 101(14) and (33)) may only be transferred to facilities operating in compliance with the Resource Conservation and Recovery Act or other applicable Federal or State requirements.

With this email I am writing to ask about the following facility:

U.S. Ecology of Idaho - Site B  
20400 Lemley Road  
Grand View, ID 83624  
ID # IDD073114654

It's been a few months since I last checked with you about this facility, so it's time for me to check in with you again. Has the Idaho Department of Environmental Quality identified any violations, uncontrolled releases, or other issues that may impact the ability of this facility to receive CERCLA waste? If so, please provide a brief summary of the issues.

Thank you very much.

Jennifer Parker  
U.S. Environmental Protection Agency, Region 10  
Multimedia Inspection and RCRA Enforcement Unit  
1200 Sixth Ave, Suite 900, OCE-101  
Seattle, Washington 98101

(206) 553-1900  
1-800-424-4EPA